

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MICHAEL SHVARTSMAN, et al.,

Defendants.

23 Cr. 307 (LJL)

DECLARATION

MATTHEW R. SHAHABIAN, hereby declares under the penalties of perjury and pursuant to 28 U.S.C. § 1746:

1. I am an Assistant United States Attorney (“AUSA”) in the U.S. Attorney’s Office for the Southern District of New York (the “Office”). I make this declaration in support of the Government’s Ominbus Opposition to the Defendants’ Pretrial Motions.

2. Attached as Exhibit 1 is a true and accurate copy of a voicemail from Grant Smith left for AUSA Michael Berger of the U.S. Attorney’s Office for the Southern District of Florida, on or about April 13, 2023.

3. Attached as Exhibit 2 is a true and accurate copy of a U.S. Customs and Border Protection (“CBP”) Secondary Inspection Report for the secondary inspection of Bruce Garelick at JFK Airport, which occurred on or about December 31, 2021.

4. Attached as Exhibit 3 is a true and accurate copy of a CBP Electronic Media Report for the secondary inspection of Bruce Garelick at JFK Airport, which occurred on or about December 31, 2021.

5. Attached as Exhibit 4 is a true and accurate copy of an FBI 302 report for the interview of Bruce Garelick and seizure of his cellphone, which occurred on or about June 15, 2022.

Dated: January 12, 2024
New York, New York

/s/
Matthew R. Shahabian
Assistant United States Attorney